

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EARL BEARD and ALEXIS LOPEZ, CRAIG
BAHAM, and ROBERT VAN HORN,

Case No. 2:17-cv-00663-JLR

Plaintiffs,

v₁

ECOLAB, INC.,

Defendant.

**STIPULATION FOR LIMITED
EXTENSION OF JOINT STATUS
REPORT DEADLINE AND
PROPOSED ORDER**

Noted For Consideration:
July 12, 2017

STIPULATION

The parties hereby stipulate and jointly request that the Court grant a two-week extension of the Joint Status Report deadline from July 14, 2017 to July 28, 2017. Good cause exists for the extension as described herein.

On April 27, 2017, Plaintiffs Earl Beard and Alexis Lopez filed a Collective Action Complaint. Dkt. No. 1. On May 3, 2017, Plaintiffs filed the opt-in consent forms of Craig Baham and Robert Van Horn. Dkt. No. 7. On June 9, 2017, the Court entered an Order Regarding Initial Disclosures, Joint Status Report and Early Statement, which set a deadline of July 14, 2017 for the parties' Joint Status Report, among other deadlines. Dkt. No. 15.

**STIPULATION FOR LIMITED EXTENSION OF
JOINT STATUS REPORT DEADLINE AND
[PROPOSED] ORDER - 1**

Case No. 2:17-cv-00663-JLR

LITTLER MENDELSON, P.C.
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1 On June 22, 2017, the parties participated in a telephone conference pursuant to Federal
2 Rule of Civil Procedure 26(f) and were prepared to discuss a draft Joint Status Report. At that
3 time, Plaintiffs indicated that they did not expect other opt-in plaintiffs to join the action because
4 the potential claims of other potential claimants had already been resolved. The parties
5 participated in a follow-up conference on June 27, 2017. As a result of these discussions,
6 Plaintiffs filed a First Amended Complaint on June 29, 2017. Dkt. No. 19. The First Amended
7 Complaint identified Beard, Lopez, Baham, and Van Horn as named Plaintiffs and removed
8 Plaintiffs' collective and class action allegations. This amendment changed the scope of the case
9 and the draft Joint Status Report that the parties had been discussing.

10 Further, the parties have been engaged in extensive discussions in an attempt to resolve
11 this entire matter. The parties respectfully request that the Court allow a brief two-week
12 extension of the Joint Status Report deadline so that the parties can complete their discussions
13 and avoid incurring unnecessary expense and the time and resources of the Court. This
14 extension will not affect any other deadlines in the case.

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STIPULATION FOR LIMITED EXTENSION OF
JOINT STATUS REPORT DEADLINE AND
[PROPOSED] ORDER - 2
Case No. 2:17-cv-00663-JLR

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 July 12, 2017

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25 **STIPULATION FOR LIMITED EXTENSION OF
JOINT STATUS REPORT DEADLINE AND
[PROPOSED] ORDER - 3**
26 Case No. 2:17-cv-00663-JLR

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ORDER

Pursuant to the parties' agreement, it is hereby ORDERED that:

1. The Stipulation for Limited Extension of Joint Status Report Deadline is GRANTED.
2. The parties' Joint Status Report shall be due on July 28, 2017.

DATED: 12 July 2017

The Honorable James L. Robart
U.S. District Judge

**STIPULATION FOR LIMITED EXTENSION OF
JOINT STATUS REPORT DEADLINE AND
[PROPOSED] ORDER - 2**

[PROPOSED] ORDER

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CERTIFICATE OF SERVICE

I am a resident of the State of Washington, over the age of eighteen years, and not a party to the within action. My business address is One Union Square, 600 University Street, Ste. 3200, Seattle, WA 98101. On July 12, 2017, I

ELECTRONICALLY FILED the foregoing document(s) with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Michael C. Subit, WSBA #29189 msubit@frankfreed.com FRANK FREED SUBIT & THOMAS Hoge Building 705 Second Avenue, Suite 1200 Seattle, WA 98104-1729	Michael J.D. Sweeney <i>Pro Hac Vice</i> mswweeney@getmansweeney.com Artemio Guerra <i>Pro Hac Vice</i> aguerra@getmansweeney.com
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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 12, 2017, at Seattle, Washington.

s/ Sally Swearerger
Sally Swearerger
sswearinger@littler.com
LITTLER MENDELSON, P.C.

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**STIPULATION FOR LIMITED EXTENSION OF
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